#### UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA Richmond Division

In re:	)	Chapter 11
	)	
CIRCUIT CITY STORES, INC., et al.,	)	Case No. <b>08-35653</b>
	)	
Debtors.	)	Jointly Administered

# MOTION FOR ADMISSION PRO HAC VICE (MICHAEL A. STOVER)

Troy Savenko ("Movant") hereby moves the Court, pursuant to Local Bankruptcy Rule 2090-1(E), to enter an order authorizing Michael A. Stover, an attorney and partner with the law firm of Wright, Constable & Skeen, L.L.P., to appear <u>pro hac vice</u> in the above-captioned bankruptcy case before the United States Bankruptcy Court for the Eastern District of Virginia (the "Bankruptcy Case") to represent Safeco Insurance Company of America ("Safeco"), and in support of this Motion, the Movant states as follows:

1. Mr. Stover is a partner with the law firm of Wright, Constable & Skeen, L.L.P. and a member in good standing of the Bar of Maryland. He is admitted to practice before the United States District Court for the District of Maryland, the United States Bankruptcy Court for the District of Maryland, the United States Court of Appeals for the Third and Fourth Circuits, and the United States Court of Federal Claims. There are no disciplinary proceedings pending against Mr. Stover in any jurisdiction in which he is admitted to practice.

Troy Savenko (Va. Bar No. 44516) Leslie A. Skiba (Va. Bar No. 48783) GREGORY KAPLAN, PLC 7 East Second Street (23224-4253) Post Office Box 2470

Post Office Box 24/0 Richmond, Virginia 23218-2470 Telephone:(804) 423-7921 Facsimile: (804) 230-0024 Case 08-35653-KRH Doc 5387 Filed 10/28/09 Entered 10/28/09 15:00:37 Desc Main Document Page 2 of 6

2. Movant requests that this Court authorize Mr. Stover to appear and be heard at

hearings and otherwise participate in the Bankruptcy Case (and related proceedings) on behalf of

Safeco.

3. Movant and his law firm shall serve as co-counsel with Mr. Stover for his

participation in the Bankruptcy Case (and related proceedings) on behalf of Safeco.

4. Notice of this Motion will be provided electronically to (a) the Office of the

United Trustee, (b) to counsel for the Debtors, and (c) all persons receiving electronic notice in

the Bankruptcy Case as of the service hereof.

WHEREFORE, Movant respectfully requests that this Court enter an Order authorizing

Michael A. Stover to appear pro hac vice in the Bankruptcy Case in substantially the same form

as Exhibit A attached hereto and grant such other and further relief as is just.

Dated: October 28, 2009

Respectfully submitted,

/s/ Troy Savenko

Troy Savenko (Va. Bar No. 44516)

Leslie A. Skiba (Va. Bar No. 48783)

GREGORY KAPLAN, PLC

7 East Second Street (23224-4253)

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Telephone: (804) 423-7921

Facsimile: (804) 230-0024

Counsel to Safeco Insurance Company of

America

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### **CERTIFICATE OF SERVICE**

I hereby certify that on October 28, 2009, a copy of the foregoing was filed and served via the Court's Electronic Case Filing System on all parties receiving such notice, including the following: (a) counsel for the Debtor; (b) the United States Trustee; (c) counsel for the Official Committee of Unsecured Creditors; and (d) all parties that have requested notice of papers with the Court's CM/ECF Noticing System pursuant to Rule 2002 of the Federal Rules of Bankruptcy Procedure.

/s/ Troy Savenko	
Movant	

**EXHIBIT A** 

#### UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA Richmond Division

In re:	)	Chapter 11
	)	_
CIRCUIT CITY STORES, INC., et al.,	)	Case No. <b>08-35653</b>
	)	
Debtors.	)	Jointly Administered

# ORDER GRANTING ADMISSION PRO HAC VICE (MICHAEL A. STOVER)

This matter came before the Court upon the Motion for Admission Pro Hac Vice of Michael A. Stover (the "Motion") filed by Troy Savenko, seeking admission pro hac vice for Michael A. Stover, of the law firm Wright, Constable & Skeen, L.L.P., in the above-styled bankruptcy case (the "Bankruptcy Case") pursuant to local Bankruptcy Rule 2090-1(E). After review of the Motion and statements therein, the Court finds that adequate notice of the Motion has been provided, no other or further notice is necessary or required, and it is appropriate that Michael A. Stover be authorized to practice pro hac vice before the Court in this Bankruptcy Case, it is hereby

#### ORDERED as follows:

- 1. The Motion is granted.
- 2. Michael A. Stover, of the law firm of Wright, Constable & Skeen, L.L.P., is hereby admitted to appear and participate in this Bankruptcy Case and any related proceedings

Troy Savenko (Va. Bar No. 44516) Leslie A. Skiba (Va. Bar No. 48783) GREGORY KAPLAN, PLC 7 East Second Street (23224-4253) Post Office Box 2470

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pro hac vice pursuant to Local Bankruptcy Rule 2090-1(E)(2) on behalf of Safeco Insurance				
Company of America,				
ENTERED:	UNITED STATES BANKRUPTCY JUDGE			
I ASK FOR THIS:				
Troy Savenko (Va. Bar No. 44516) Leslie A. Skiba (Va. Bar No. 48783) GREGORY KAPLAN, PLC 7 East Second Street (23224-4253) Post Office Box 2470 Richmond, VA 23218-2470 Telephone: (804) 423-7921 Facsimile: (804) 230-0024				
Counsel to Safeco Insurance Company of America				
Rule 90221-1 Certification				
I hereby certify that the foregoing has either been endorsed by or served upon all necessary parties simultaneously with the filing of the Motion.				

Counsel

### **SERVICE LIST**

Jeffrey N. Pomerantz	Dion W. Hayes	
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Committee of Unsecured Creditors		
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Committee of Unsecured Creditors	Counsel to Debtors	
Robert B. Van Arsdale	Michael A. Stover	
Office of the United States Trustee	Wright, Constable & Skeen, L.L.P.	
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Assistant United States Trustee	mstover@wcslaw.com	
	Counsel to Safeco Insurance Company of	
	America	